

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF OKLAHOMA

FILED

DEC 09 2021

PATRICK KEANEY  
Clerk, U.S. District Court

SEALED  
Case No.

By \_\_\_\_\_  
Deputy Clerk

CR 21-381-RAW

UNITED STATES OF AMERICA,

*Plaintiff,*

v.

KENDALL BRIAN MORGAN,

*Defendant.*

INDICTMENT

The Federal Grand Jury charges:

COUNT ONE

**DEPRIVATION OF RIGHTS UNDER COLOR OF LAW**  
**[18 U.S.C. § 242]**

On or about January 25, 2017, within the Eastern District of Oklahoma, the defendant **KENDALL BRIAN MORGAN**, then employed as the Undersheriff of the LeFlore County Sheriff's Department, while acting under color of the laws of the State of Oklahoma, willfully deprived arrestee D.P. of the right, secured and protected by the Constitution and laws of the United States, to be free from unreasonable seizures, which includes the right to be free from the use of unreasonable force by a law enforcement officer. Specifically, **KENDALL BRIAN MORGAN** struck D.P. while D.P. was handcuffed behind his back and unresisting. The offense resulted in bodily injury to D.P. All in violation of Title 18, United States Code, Section 242.

COUNT TWO

**DEPRIVATION OF RIGHTS UNDER COLOR OF LAW**  
**[18 U.S.C. § 242]**

On or about January 25, 2017, within the Eastern District of Oklahoma, the defendant **KENDALL BRIAN MORGAN**, then employed as the Undersheriff of the LeFlore County

Sheriff's Department, while acting under color of the laws of the State of Oklahoma, willfully deprived arrestee A.S. of the right, secured and protected by the Constitution and laws of the United States, to be free from unreasonable seizures, which includes the right to be free from the use of unreasonable force by a law enforcement officer. Specifically, **KENDALL BRIAN MORGAN** struck A.S. while he was handcuffed behind his back and unresisting. The offense resulted in bodily injury to A.S. All in violation of Title 18, United States Code, Section 242.

**COUNT THREE**

**DEPRIVATION OF RIGHTS UNDER COLOR OF LAW  
[18 U.S.C. § 242]**

On or about December 13, 2017, within the Eastern District of Oklahoma, the defendant **KENDALL BRIAN MORGAN**, then employed as the Undersheriff of the LeFlore County Sheriff's Department, while acting under color of the laws of the State of Oklahoma, willfully deprived arrestee C.R., a juvenile, of the right, secured and protected by the Constitution and laws of the United States, to be free from unreasonable seizures, which includes the right to be free from the use of unreasonable force by a law enforcement officer. Specifically, **KENDALL BRIAN MORGAN** struck C.R. while C.R. was unresisting, both before and after C.R. was handcuffed. The offense resulted in bodily injury to C.R. All in violation of Title 18, United States Code, Section 242.

A TRUE BILL:

CHRISTOPHER J. WILSON  
Acting United States Attorney

KRISTEN CLARKE  
Assistant Attorney General

Pursuant to the E-Government Act,  
the original indictment has been filed  
under seal in the Clerk's Office.

s / Foreperson  
**FOREPERSON OF THE GRAND JURY**

  
JARROD LEAMAN, OBA #22623

Assistant United States Attorney

AVNER SHAPIRO, D.C. Bar #452375

Trial Attorney, Criminal Section, Civil Rights Division